

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

THE ART INSTITUTE OF PHILADELPHIA
LLC, *et al.*,
Debtors.

Chapter 7
Case No. 18-11535 (LSS)

(Jointly Administered)

GEORGE L. MILLER, Chapter 7 Trustee,

Plaintiff,

JURY TRIAL DEMANDED

– against –

Adversary Proceeding
No. 20-50627 (LSS)

TODD S. NELSON, JOHN R. McKERNAN,
SAMUEL C. COWLEY, EDWARD WEST,
MARK A. McEACHEN, FRANK JALUFKA,
J. DEVITT KRAMER, MARK NOVAD, JOHN
DANIELSON, AND MICK BEEKHUIZEN,

Defendants.

**STIPULATION EXTENDING THE TIME FOR DEFENDANTS TO
ANSWER, MOVE, OR OTHERWISE RESPOND TO COMPLAINT**

Plaintiff George L. Miller (the “Plaintiff”) and defendants Todd S. Nelson, John R. McKernan, Samuel C. Cowley, Edward West, Mark A. McEachen, Frank Jalufka, J. Devitt Kramer, Mark Novad, John Danielson, and Mick Beekhuizen (the “Defendants”), by and through their undersigned counsel, hereby stipulate and agree as follows:

1. On June 17, 2020, the Plaintiff filed the Complaint commencing the above-captioned adversary proceeding;
2. Each of the Defendants hereby acknowledges service of the Complaint.

3. The Plaintiff and the Defendants agree that the date by which each Defendant shall be required to answer, move, or otherwise respond to the Complaint (the “Answer Deadline”) is September 14, 2020.

4. The parties further agree that the date by which the Plaintiff shall file his opposition to any motion filed in response to the Complaint filed by the Defendant shall be November 13, 2020.

5. The parties further agree that the date by which each Defendant shall file his reply in further support of any motion filed in response to the Complaint shall be December 14, 2020.

6. This stipulation is without prejudice to an application for, or stipulation to, a further extension of the Answer Deadline for Defendants.

Dated: August 11, 2020

Dated: August 11, 2020

PACHULSKI STANG ZIEHL &
JONES LLP

RICHARDS, LAYTON & FINGER PA

/s/ Colin R. Robinson

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Dated: August 11, 2020

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